Exhibit 3

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Attorneys for Defendants,
**COUNTY OF LOS ANGELES and SERGEANT TRAVIS KELLY (erroneously
sued and served as "SHERIFF DEPUTY BADGE NUMBER 404532")**
(Defendants is exempt from filing fees pursuant to Government Code § 6103)

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

JOSHUA ASSIFF,
 	
            Plaintiffs,
 	
    v.
 	
COUNTY OF LOS ANGELES;
SHERIFF DEPUTY BADGE
NUMBER 404532; And DOES 1
through 10,
 	
            Defendants.
	Case No.: 2:22-cv-05367 RGK(MAAx)
	
	**DEFENDANT COUNTY OF LOS
	ANGELES AND LOS ANGELES
	COUNTY SHERIFF'S DEPARTMENT
	RESPONSES TO PLAINTIFF'S
	REQUEST FOR PRODUCTION, SET
	TWO**
	
	Action Filed: August 3, 2022
	Pretrial Conference: July 10, 2023
	Trial Date: July 25, 2023
	
	Assigned to:
	Hon. R. Gary Klausner, District Judge
	Courtroom 850
	
	All Discovery Matters Referred to:
	Hon. Maria A. Audero, District Judge

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DEFENDANT COUNTY OF LOS ANGELES AND LOS ANGELES COUNTY SHERIFF'S DEPARTMENT
RESPONSES TO PLAINTIFF'S REQUEST FOR PRODUCTION, SET TWO

REQUESTING PARTY: Plaintiff, JOSHUA ASSIFF

RESPONDING PARTY: Defendant, COUNTY OF LOS ANGELES

SET NO.:   TWO

REQUEST FOR PRODUCTION NO. 9:

Any and all DOCUMENTS including without limitation any and all reports, statements, notes, documents, memoranda, photos, videos (including body worn camera video), audio recordings, emails, or texts — whether written, recorded or secured in digital format — CONCERNING the incident that occurred 24 minutes before the encounter between Defendant Kelly and Plaintiff in which Detective Kelly responded to a back-up request on an uncooperative driver (as described in section 55 in paragraph 3 on page 14 of Supervisor's Report on Use of Force which can be found on Document COUNTY000110).

RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

Objection, this request is vague, ambiguous, overbroad, and irrelevant. The request is further objectionable in that it call for information protected from disclosure by the attorney client privilege and work product doctrine. The request is further objectionable in that it requests information protected by the right to privacy of third parties guaranteed by the California Constitution and the United States Constitution, First and Fourteenth Amendments. The request for production is further objectionable in that it is beyond the scope permissible under FRCP Rule 26.

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1   Subject to and without waiving the foregoing objections, Responding Party

2   responds as follows: After diligent search and reasonable inquiry, Responding Party is

3   unable to comply with this request as it is neither able to locate any responsive records

4   nor determine that responsive documents ever existed. Discovery and investigation are

5   continuing, and Responding Party reserves the right to supplement this response.

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8   Dated: April 10, 2023   KJAR, MCKENNA & STOCKALPER, LLP

9

10   By: _____

11   PATRICK E. STOCKALPER
                                          MOLSHREE GUPTA

12   Attorneys for Defendants,
                                          COUNTY OF LOS ANGELES and SERGEANT

13   TRAVIS KELLY

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<u>VERIFICATION</u>

STATE OF CALIFORNIA   )
)

COUNTY OF LOS ANGELES   )

I have read the foregoing <u>DEFENDANT COUNTY OF LOS ANGELES AND LOS ANGELES COUNTY SHERIFF'S DEPARTMENT RESPONSES TO PLAINTIFF'S REQUEST FOR PRODUCTION, SET TWO</u> and know of its contents.

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

Executed on _____4/6_____, 2023, at _O900 HRS_, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

_____CAPTAIN DIEZ_____
Type or Print Name

_____
Signature

CERTIFICATE OF SERVICE

I am employed in the County of Los Angeles, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 841 Apollo Street, Suite 100, El Segundo, California 90245.

On April 10, 2023, I served the foregoing document described as **DEFENDANT COUNTY OF LOS ANGELES AND LOS ANGELES COUNTY SHERIFF'S DEPARTMENT RESPONSES TO PLAINTIFF'S REQUEST FOR PRODUCTION, SET TWO** on all interested parties in this action by placing a true copy thereof in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

By Mail I caused such envelope(s) to be deposited in the mail at El Segundo, California. The envelope was mailed with postage thereon fully prepaid and addressed to the parties listed on the Service List. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

XX **By Email** Based upon a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed in the Service List. My email address is scarter@kmslegal.com.

XX **State** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 10, 2023, at El Segundo, California.

_____
Spencer Carter

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SERVICE LIST

Assiff, Joshua vs. County of Los Angeles, et al.
Central District- Case No.: 2:22-cv-05367 RGK(MAAx)

Thomas M. Ferlauto, Esq. Law Office of Thomas M. Ferlauto, APC 25201 Paseo de Alicia, Ste. 270 Laguna Hills, CA 92653 EM: tmf@lawofficetmf.com	Attorney for Plaintiff, **JOSHUA ASSIFF**

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DEFENDANT COUNTY OF LOS ANGELES AND LOS ANGELES COUNTY SHERIFF'S DEPARTMENT
RESPONSES TO PLAINTIFF'S REQUEST FOR PRODUCTION, SET TWO